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through partnership

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December 21, 2021

Via ECF

Hon. Robert W. Lehrburger
United States Magistrate Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: *Dresser-Rand Co. v. Petróleos de Venezuela, S.A., et al*, No. 19-cv-02689-LLS

Dear Judge Lehrburger:

This firm represents plaintiff Dresser-Rand Company (“D-R”) in the above-referenced action. We write, pursuant to Your Honor’s Order dated December 9, 2021 (ECF No. 153), on behalf of both D-R and Defendant Petróleos de Venezuela, S.A. (“PDVSA”), to apprise the Court of the briefing schedule agreed to by the parties for the determination of attorneys’ fees and costs. Subject to Your Honor’s approval, the parties have agreed upon the following briefing schedule:

1. D-R’s moving brief shall be filed on or before January 28, 2022.
2. PDVSA’s opposition brief shall be filed on or before February 28, 2022.
3. D-R’s reply brief shall be filed on or before March 14, 2022.

We thank Your Honor and your staff for their time and attention to this matter.

Respectfully submitted,

/s/ Jordan W. Siev

Jordan W. Siev

cc: All Counsel of Record (*via ECF*)